

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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**DECLARATION OF BRIAN
FRANCOLLA**

DUSHANNE ASHLEY,

Plaintiff,

14-CV-5559 (MMH)

-against-

DET. MIKE CIVIL,

Defendant.

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BRIAN FRANCOLLA, an attorney duly admitted to practice in the State of New York, declares under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a Senior Counsel in the office of Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for defendant Detective Civil. As such, I am familiar with the facts and circumstances of this action. I make this declaration in opposition to plaintiff's supplemental motions *in limine*. In opposition to plaintiff's motion, defendant submits the exhibits described below.

2. Annexed hereto as Exhibit "A" is a copy of Relevant Portions of the Original Trial Record.

3. Annexed hereto as Exhibit “B” is a copy of Defendant’s D2.

Dated: New York, New York
July 21, 2023

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel of the
City of New York
Attorney for Defendant Mike Civil
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(212) 356-3527

By: /s/
Brian Francolla
Senior Counsel
Special Federal Litigation Division

cc: All Counsel of Record (by ECF)